

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

FILED

DEC 20 2024

CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY CR DEPUTY

IN RE: REQUEST FOR JUDICIAL
ASSISTANCE FROM THE 30TH
LABOR COURT OF ISTANBUL,
ANADOLU, TÜRKİYE IN THE
MATTER OF RAMAZAN SILAH V.
TURKEY HALKBANK JOINT-STOCK
COMPANY

Case No. 1:24MC01574 DII

APPLICATION FOR ORDER PURSUANT TO 28 U.S.C. § 1782

The United States of America, by and through counsel, petitions this Court for an Order pursuant to 28 U.S.C. § 1782(a), appointing Krysta M. Stanford, Trial Attorney, at the U.S. Department of Justice, Civil Division, Office of Foreign Litigation, Commissioner for the purpose of obtaining documents from X Corporation ("X"). Certain evidence has been requested by the 30th Labor Court of Istanbul, Anadolu, Türkiye ("Turkish Court"), pursuant to a Letter of Request issued by the Turkish Court in connection with a civil judicial proceeding captioned *Ramazan Silah v. Turkey Halkbank Joint-Stock Company*, Foreign Reference Number 2023/396.

The grounds for this Application are more fully articulated in the Memorandum of Law that has been simultaneously filed with the Application. A proposed Order is also provided for the convenience of the Court. X has advised that it does not object to the appointment of a Department of Justice Attorney as commissioner and takes no position on the issuance of the subpoena, but it reserves all rights in how it responds to the subpoena.

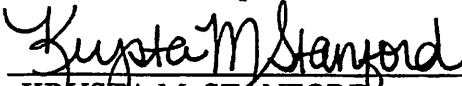
Dated: December 19, 2024

Respectfully submitted,

JAIME ESPARZA
United States Attorney

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

ADA E. BOSQUE
Acting Director, Office of Foreign Litigation
United States Department of Justice, Civil Division

By: 

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